



Response to the Needs Assessment Study: Pickering Lands, Final Report, March 2010

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Executive Summary

The *Needs Assessment Study: Pickering Lands, Final Report, March 2010* was released by Transport Canada only in July, 2011. According to the media, the study concluded that an airport would be needed in Pickering by 2027. Not so. The actual conclusion was that an airport *could* be needed between 2027 and 2037, but the date could also be 2041 or later. “[I]f and when required” was the final word. There is, in fact, no clarity in the Final Report as to when (or even if) the need for a Pickering airport will arise. The findings were questionable, ambiguous, and contradictory, as we point out in our Response.

- The study was conducted by the Greater Toronto Airports Authority (GTAA), which has a conflict of interest in the matter and was therefore incapable of delivering an impartial assessment.
- The Transport Canada passenger and aircraft-movement forecasts used in the study were inflated.
- Toronto Pearson’s capacity limits were determined by Toronto Pearson’s operator – the GTAA; given the GTAA’s conflict of interest in the matter, the stated capacity limits are open to question.
- The ill-suited model chosen to demonstrate airport catchment areas and travel times skewed the findings so as to give results that favoured an airport to the east.
- The Report showed that a virtual prerequisite for the success of a secondary airport is the restricting or temporary closing of a city’s primary airport. Pickering would be a secondary airport for Toronto, yet no closure is planned for Pearson, suggesting that, like Mirabel, a Pickering airport could fail.
- The Report states that successful secondary airports need to operate without oppressive restrictions on noise or traffic. If this is the case, Pickering would not succeed. It would be adjacent to the new town of Seaton, and one of its approaches would be over Ajax. Significant restrictions would be inevitable.
- What need(s) would a Pickering Airport be built to serve? The Report fails to find any:
 - Its authors opine that the airport would likely handle “low-cost” carriers, yet they also acknowledge (a) that Hamilton and City Centre, both currently serving such carriers, have a history of significant passenger-volume volatility; and (b) that, given the small number of Canadian air carriers, it would be a challenge to establish a secondary airport for Toronto. Based on these caveats, it appears that Pickering could not count on enough low-cost carrier business to be successful.
 - The Report states that it is impossible to predict the degree to which airline cooperation would or would not occur in Pickering. So Pickering couldn’t count on serving commercial airline traffic.
 - The Report states that no new airport would be needed to handle corporate jet and general aviation traffic, even if Buttonville, City Centre (Billy Bishop), and Oshawa airports all closed. So Pickering would not be needed for CJ/GA traffic.
 - The Report acknowledges: (a) that cargo airlines will want to stay where the large commercial passenger planes and freighters are (namely, at Pearson and Hamilton); (b) that there is no foreseeable shortage of cargo capacity at existing facilities; and (c) that no all-cargo carrier is likely to relocate to Pickering. Based on this information, Pickering would not be serving cargo airlines. What’s left? Nothing. Ironically, the Report makes a convincing case *against* a Pickering airport!
- As a reason for holding onto the site for a possible airport, the Report claims that it would be hard to amass such a large site again. Untrue. The government can expropriate any land it needs at any time.
- As another reason for holding onto the site for an airport, the Report states that the money has already been paid for the land. True. But that’s no reason to build an unneeded/unwanted airport there. The land could be put to far, far better use for GTA residents and Canadians in general.
- The Report’s lame conclusion is that the site should be held for an airport “if and when required.” How long might that be? No one can say *when*. And *if* can mean never.

The authors of the Final Report waffle, hedge, and conjecture. They rely on inflated forecasts and distorted data. They undermine and contradict their own arguments. They base their conclusions on outdated studies and unsubstantiated claims. Bottom line: Before any government decides whether or not to build an airport on the Pickering lands, an **objective, comprehensive, and professional** study is essential. The GTAA’s needs assessment study met none of these criteria. Land Over Landings, 2012

Response to the *Needs Assessment Study: Pickering Lands, Final Report, March 2010*

Introduction / Background

In 1972, the federal government expropriated 18,600 acres of land in north Pickering for a second international airport for Toronto. The airport plan was shelved in 1975, thanks to strong public protest and the Ontario government's withdrawal of support for the project, but the federal government retained ownership of the site. In 2001, Transport Canada asked the Greater Toronto Airports Authority (GTAA) to undertake "interim planning work" to help the government make a decision about the site. The result was a draft plan, submitted in 2004, for a sizeable airport. In 2005, Transport Canada announced the launch of a study to assess whether an airport in Pickering was needed, and in May, 2007, retained the GTAA to conduct the study. In March, 2010, the GTAA submitted its Final Report to Transport Canada. The Report's findings were made public only on July 11, 2011.

The needs study was supposed to take six months.¹ It went on for three years. When the findings were eventually released, the news media generally took them to mean that an airport in Pickering would be required by 2027.² Such an inference could indeed be drawn from Transport Canada's executive summary³ but the summary actually said that an airport was "not expected to be required before 2027 and possibly not before 2037" [our italics]. Furthermore, the summary omitted to say that:

- the study had been conducted by an organization with a known bias towards building an airport in Pickering;
- the study's methodology was seriously flawed and gave skewed results;
- the Final Report, mostly based on 2007 data, was out of date by the time of its submission, and was even more out of date by the time of its release;
- even after 3+ years of work, the study failed to make a convincing case for a Pickering airport. It was unable to state with confidence that the airport would ever been needed. The final reference as to timing was "if and when required."

Our Response to the Final Report covers these and other matters of concern. And it urges a public outcry should the government decide to build an airport in Pickering on the basis of recommendations made in the *Needs Assessment Study: Pickering Lands, Final Report, March 2010*.

¹ Transport Canada News Release No. ON 03/07. See <http://www.tc.gc.ca/eng/ontario/pickering-documents-contract0507-1533.htm>

² They still think this. See <http://www.globaltoronto.com/video/protesting+the+pickering+airport/video.html?v=2201826504&p=1&s=dd#video>

³ See <http://www.tc.gc.ca/eng/ontario/pickeringstudy.htm>

Since When Has a Tainted Report Been Acceptable?

Let's look at the provenance of the *Needs Assessment Study: Pickering Lands*. The Report itself tells us this:

In the fall of 2005, the Minister of Transport announced that Transport Canada would:

1. Coordinate further study regarding whether the airports serving the Greater Golden Horseshoe (GGH) area have the capacity to accommodate future air traffic demand.
2. Conduct a comprehensive due diligence review to determine the next steps for the Pickering lands.

As a significant part of the first item, Transport Canada retained the GTAA to undertake the Needs Assessment Study – Pickering Lands. This document is the report associated with the Needs Assessment Study. (ch. 1, pp. 1-2)

Somehow, in the space of two paragraphs, the ground inexplicably shifts from a study of GGH airport capacities (please note that Pickering is not a GGH airport; it has no capacity; it doesn't exist) to a study in which Pickering has become the focus.

Moreover, the study is to be conducted by the Greater Toronto Airports Authority, the likely developer and operator of any new airport in the Greater Toronto Area. The GTAA stands to benefit from an airport in Pickering. It is not an impartial body. At the time of its retention for this needs study, the GTAA had recently completed detailed interim planning work for a regional/reliever airport on the Pickering lands. Its *Pickering Airport Draft Plan Report*, submitted to Transport Canada in December, 2004, contained 35 possible runway layouts for a large three-runway airport, and included the GTAA's preferences and recommendations. Now, three years later, the same GTAA has been asked to assess whether the airport it just spent 3+ years planning is really needed.

The GTAA has made no secret of its position on Pickering. We can read in the *Draft Plan Report* (p. v) that "it is the GTAA's mandate to support the development of a regional system of airports in south central Ontario." In the Authority's 2005 *Sustainability Report* (p. 12), we read that "the GTAA [...] will continue to cooperate with the federal government to advance the planning for the future reliever airport on the Pickering lands." In *Celebrating Success: 10-Year Anniversary, 1996-2006* (p. 86), we learn that the GTAA "remains committed to working towards an efficient system of airports in south-central Ontario [and that] this work extends beyond Toronto Pearson to existing airports within the Greater Toronto Area, including in the east the proposed site for a future airport in Pickering."

The GTAA has both a perceived and a real conflict of interest in the matter of a Pickering airport, which makes the Authority incapable of carrying out an impartial assessment of, or reaching objective or credible conclusions on, the Pickering airport issue.

Flawed Methodology and Unsupported Claims

Let's look at the assumptions on which the study based its analyses and reached its conclusions.

1. Unrealistic Passenger Traffic Forecasts

In mid-2007, Transport Canada provided the study with a set of “baseline” passenger forecasts for Toronto Pearson. In 2008, the department supplied a second set of baseline forecasts, and another set called “pessimistic.” A better description might have been “more realistic.” The new baseline forecasts reflected actual 2007 traffic figures while the other, called “worst case,” assumed higher prices for oil. But the new figures were not provided to rectify earlier miscalculations. They were to be used for “sensitivity testing” – that is, for “what if?” exercises.

In fact, all sets of forecasts were optimistic. We know this because we have access to Pearson's actual passenger volumes for 2007 through 2011, as reported on the GTAA's web site. They show that Transport Canada's forecasts for even the earliest dates of the study were too high. Passenger estimates for 2007, a year that was already well under way when the study was announced on May 9, were 32 million, more than half a million higher than the real numbers. The forecast for 2009 was 35 million, but Pearson handled only 30.4 million that year. For 2010, the forecast was for more than 36 million, but the actual number was 31.9 million. In 2011, Pearson handled 33.4 million passengers, so will not come close, in 2012, to the 38.7 million predicted by Transport Canada for that year.

The gap between estimated and actual numbers will widen progressively after 2012, given that the predicted passenger volumes begin, at that point, to show a steady upward trajectory even though air traffic volumes have historically had a bumpy ride. Events of many kinds, both local and global, can affect travel numbers. Year-over-year growth can never be guaranteed. (The Report itself states (ch. 2, p. 3) that, in 1988, Pearson handled 20 million passengers; yet seven years later, in 1995 (ch. 2, p. 12), the airport was said to be handling only around 19 million. The GTAA's web site shows that Pearson processed 30.8 million passengers in 2006 but only 30.4 million three years later.)

Even if the overstating of baseline and “pessimistic” estimates was unintentional in 2007 and 2008, continued use of those numbers during the multi-year study can only raise eyebrows. Transport Canada and the GTAA couldn't possibly have been unaware that the forecasts they were working with were too high. They had access to *actual* passenger figures for 2007 through 2009 during the course of the study, and Transport Canada had access to *actual* passenger figures for 2010 before the Final Report was released. Yet the forecasts were never adjusted, and the study's conclusions were based on the inflated baseline figures. All actual figures were far lower than those used in the Report, which is mute on the discrepancies, and Transport Canada made no reference to the discrepancies when releasing the Report.

The only conclusion that can be drawn from this is that the inflated figures allowed the GTAA – or the GTAA on Transport Canada's behalf – to obtain the desired results, whereas realistic forecasts or actual figures would have done the opposite and shown *no need* for an airport within the time frame of the study (that is, up to 2032) and *no need* for an airport for an undetermined length of time after that – if ever.

2. Pearson's Capacity Limits: What Are They, Really?

The Final Report states (ch. 11, p. 4) that Pearson will reach capacity when annual through-put reaches 54 million passengers – or 60 million, if general aviation traffic is offloaded to another airport or two.

These capacity figures appear to come, not from an independent third party, but from the GTAA itself. Since the GTAA is not an impartial participant in this study but is the operator and manager of Pearson, it

seems fair to ask: Are these Pearson's *true* capacity limits? Capacity and efficiency go hand in hand. So could Pearson be run more efficiently?

The latter is no idle question. In British Columbia, a research group – the Air Transport Research Society (ATRS), guided by a team of fourteen leading international academics – has been producing an annual Global Airport Benchmarking Report since 2001.⁴ The report compares efficiency and costs at major airports worldwide. Pearson had been losing ground in the years leading up to the 2007 report. When that report was published (over 150 major airports were covered by the survey), Pearson was shown to be among the least efficient in the study, while its landing fees were *by far* the highest. The GTAA's CEO complained of "a total lack of academic rigour" in the report, and of "unsupported findings," and threatened legal action unless Pearson was removed from future surveys.⁵ The ATRS complied and dropped Pearson, but pointed out that its findings were based on raw data mostly supplied by the GTAA itself. Pearson has not figured in the efficiency analyses since, but costs are in the public domain so they are still shown (and appear to be exorbitant, compared with other airports, even after a 24 per cent reduction over the past few years).

It is possible, of course, that the research group erred somewhere and that Pearson was right to complain, but the ATRS's findings can't be too wide of the mark. The survey is well-respected, and airports and governments around the world use its conclusions to improve airport efficiency and refine policies.

Could Pearson be run more efficiently? The question has to be asked. Pearson's capacity limits and its ability to cope with traffic are at the root of the whole Pickering airport issue.

The conviction that Pearson would be unable to handle the huge traffic volumes predicted for the 1980s was, at least in part, what drove the federal government to expropriate land for a second major Toronto airport in the 1970s. The same arguments, with slippages in dates, revised capacity limits, and varying passenger forecasts, have been used by Transport Canada ever since, even though the passenger volumes they predicted every time there was a study have never materialized.

The GTAA's forecasts are no more accurate. In *Looking Ahead: The Airport Master Plan (2000–2020)*,⁶ we are told (ch. 15, p. 4) that "ultimately, Toronto Pearson has a finite capacity which will be reached irrespective of demand management and efficiency measures, well within the time frame of the current Master Plan period" – in other words, well before 2025. But the needs assessment study's Final Report contradicts this statement and observes that "the timing of that need is further in the future than has been contemplated in previous studies, most likely in the 2027–2037 time period." Or even later (ch. 12, p. 11), if existing airports enhance their facilities – as they undoubtedly will.

Could we glean more from a more current Master Plan for Pearson? Not easily. The GTAA's web site (which pointedly tells us that printed versions are not available), makes reference to *Taking Flight: The Airport Master Plan 2008–2030*. But (at time of writing) the links are all to the 2000–2020 Master Plan. The later version is nowhere to be found.

What *are* Pearson's true capacity limits? Has every option for expanding the airport or for maximizing capacity been thoroughly explored – and acted upon wherever feasible? Has any objective, third-party study been undertaken on this critical issue?

These questions must be answered to taxpayers' satisfaction before any decision is made to commit billions of our dollars to building an airport on the Pickering site – or anywhere else, for that matter.

3. The Mystery of Aircraft Movements and Airport Capacity

The maximum number of takeoffs and landings that an airport can safely handle has to be the single most important factor in determining an airport's capacity limits – far more so than the airport's passenger-

⁴ <http://www.atrsworld.org/>

⁵ See "Pearson disputes report finding airport inefficient," 24 March 2008, TheStar.com.

⁶ See <http://www.torontopearson.com/en/gtaa/master-plan/#>

handling capacity. Terminals can be expanded and reconfigured in any number of ways to handle more people, but runways are a different matter entirely.

Yet the Final Report allots a mere 2½ pages to the topic. It is impossible to get a clear picture of aircraft movements, partly because the government has chosen to censor one of the relevant charts, and partly because the section is almost entirely devoted to a discussion of differences between three sets of forecasts provided by Transport Canada, all of which show a similar pattern: a rollercoaster ride where actual data are concerned, followed by an unbroken rise in aircraft movements to the year 2032. Only the “pessimistic” projection lags (eventually by about 12 years), behind the two “baseline” forecasts, which neatly track each other towards the 900,000 aircraft-movement mark at the far right of the charts. Looking at the charts, one can’t help noticing that the path traced by the actual data resembles (appropriately enough) the bumpy ride down a runway, while the path traced by the forecasts is like the smooth, unhindered skyward climb once the plane is airborne. It’s impossible to take the forecasts seriously.

The aircraft movements under discussion are those of the major airlines that engage in moving passengers using the passenger terminals, as well as air carrier movements such as “ferry and technical flights,” charter flights not using terminals, and other commercial operations by air carriers. Cargo and corporate jet / general aviation movements are not part of this exercise.

Here’s what *can* be gleaned about aircraft movements at Pearson from various references elsewhere in the Final Report:

- (ch. 2, p. 3) That in Transport Canada’s 1990 report *Aviation in Southern Ontario – A Strategy for the Future*, aircraft movements between 1983 and 1988 were said to have risen from 240,000 to almost 350,000, “representing increases of over 40 per cent.”
- (ch. 2, pp. 9, 12) That Pearson’s 1995 Master Plan set the airport’s ultimate capacity limit at 555,000 aircraft movements, based on an eventual six-runway configuration, and that Pearson, then at 305,000 aircraft movements, was expected to be handling 530,000 movements by 2020. Note that the 305,000 figure represents a decline of some 45,000 movements from the number handled seven years earlier (see first bullet point), although this fact is passed over in silence.
- (ch. 2, p. 13) That Transport Canada’s 1995 Southern Ontario Area Airports Study (SOAAS) reported that Pearson’s full six-runway capacity “would be reached within the 2012-2025 time period.”
- (ch. 2, p. 24) That the GTAA’s first Master Plan for Pearson, published in 1999, set the airport’s ultimate capacity at 670,000 aircraft movements. “The planning horizon of the 1999 Master Plan was to the year 2020,” states the needs assessment study’s Final Report, “at which time demand at Pearson was projected to be [...] 665,000 aircraft movements.”
- (ch. 2, p. 28) That the GTAA’s second Master Plan for Pearson, published in 2007, set the airport’s ultimate capacity at a new high – 680,000 aircraft movements – and projected 801,000 aircraft movements at Pearson by the year 2030. The needs assessment study’s Final Report observes that the 2007 Master Plan was “the first Pearson Master Plan in which the demand levels projected for the end of the planning horizon exceeded the airport’s estimated ultimate capacity.”

And this is where conflict of interest, whether real or perceived, can discredit even the most conscientious study. The GTAA was conducting the needs assessment study for Transport Canada at the very time that it was working on its latest Master Plan for Pearson.⁷ How easy, then, to ensure that projected demand levels in the Master Plan exceeded Pearson’s estimated ultimate capacity, thereby providing ideal “proof” of need for a Pickering airport for those undertaking the study.

⁷ The GTAA’s retention for the needs assessment study was announced in May 2007. The Final Report states that the Master Plan was published in December 2007. Various bibliographies give the publication date as 2008. We have been unable to track down the exact publication date, but on 13 August 2007 the GTAA’s director of Public Affairs and Communications wrote to the City of Toronto that the GTAA was “currently updating its Master Plan for the Pearson International Airport”; elsewhere, delivery to the Minister of Transport was said to be scheduled for December 2007.

Such suspicions are impossible to shake off. The study was not conducted by an objective third party. Transport Canada and the GTAA both want an airport at Pickering. And a recommendation to proceed with the airport would be bolstered if it could be shown that Pearson was facing demand levels that would soon outstrip its handling capacity.

But how accurate are those projected demand levels? In the Final Report we are told that the forecast for air carrier movements is shown graphically by sector in Figure 3-10 – but the chart has been blacked out and there is no accompanying discussion. In Figure 3-11, we are allowed to see a graph showing aircraft movements by airport. There, Buttonville, City Centre, Hamilton, Oshawa, Pearson, and Waterloo are all represented. We are told that “the current level of about 490,000 annual air carrier aircraft movements is expected to rise to *over 950,000 by 2032*, equivalent to *an average annual growth rate of approximately 2.6 per cent.*” The italics are ours, and they are warranted. The 950,000 figure is a staggering 149,000 aircraft movements higher than predicted at Pearson for 2030 by the 2007 Master Plan.⁸

Is the 950,000 prediction even close to realistic? Here are total actual aircraft movements at Pearson for the years 2000 to 2011⁹:

2000	426,506
2001	406,360
2002	383,189
2003	370,996
2004	403,778
2005	409,401
2006	417,932
2007	425,500
2008	430,588
2009	407,352
2010	418,298
2011	428,477

The figures show that Pearson handled only 1,971 more aircraft movements in 2011 than it handled in 2000, a volume increase of just under half a percentage point over twelve years. So how, pray, could Transport Canada’s forecasters conclude that aircraft movements will suddenly see an extravagant growth rate of 2.6 per cent per annum over the next twenty+ years, virtually doubling the current number of movements per annum? Was a modelling system used? Where are the data to support the forecast? What is the reasoning? The Report says nothing and we are left with a mystery.

The accuracy of forecasts of even the most sophisticated modelling systems is wholly dependent on the amount of (or lack of) bias that has been built into them and on the accuracy and legitimacy of the raw data they are fed. Since the Final Report is mute on how the astounding forecast of 950,000 aircraft movements was arrived at, we must draw our own conclusions.

⁸ Although other airports were included in the 2032 projection, Pearson was and always will be handling the lion’s share of aircraft movements. Figure 3-11 shows that the other airports combined account for about a fifth of such movements.

⁹ See <http://www.torontopearson.com/en/gtaa/statistics/#> Given that Pearson is the primary airport, a look at its figures for the past twelve years gives an acceptably representative picture of local air carrier movements. As the figures show, depending on the year in which the data were analysed and the Report’s chapter was written (most likely 2008 or 2009), Pearson’s share of the 490,000 movements referred to above would have been either 430,588 or 407,352.

4. Distorted Airport Catchment Areas and Access Times

Much defensive breath was spent in justifying the methodology used to estimate, according to the Report, “future access times to Pearson and each of the potential reliever airports [...] to help predict the likely distribution of passengers across the airport system.”

The system chosen for estimating access times is described in the Final Report at considerable length (ch. 6, pp. 1-6). We are told that other government entities rely on it to determine GTA transportation components and rail proposals. Indeed, the model seems well-suited for the modes of transportation it was designed to assess: road traffic, commuter-rail and subway traffic, walking/biking traffic. But to use the same tool to show airport catchment areas and to compare access times to airports distorts reality and artificially weights the findings in favour of an airport to the east of Toronto.

The borders of the Greater Golden Horseshoe do not, in themselves, define the catchment area of any airport within them. They balloon out to the east and north-east, taking in both Peterborough and Lindsay. Yet on the other side of Pearson, they cling to the contours of Lake Ontario, creating a narrow strip that excludes everything west of Kitchener-Waterloo and much else besides.

The borders of the GGH map do not stop Ontarians to the west of the borders from falling naturally within Pearson’s catchment area or within the catchment area(s) of the Kitchener-Waterloo and/or Hamilton airports, either, and those Ontarians would continue to be potential passengers if the two smaller airports were developed as reliever airports. Yet these Ontarians were excluded from the study. If it’s fair to include potential passengers as far east as Lindsay, then those as far west as London must also be included. London and Lindsay are similar distances from Pearson. While London does have its own international airport, the domestic service is limited, as is the choice of international flights. For the rest, residents of London and environs must use Pearson.

By excluding passengers to the west, the model gave a clear eastern bias to the study. Even a cursory glance shows this, but the GTAA used the model nonetheless, and stuck strictly to its boundaries.

Was no other model available? If not, does a legitimate study resort to an inappropriate model and blithely base its conclusions on the skewed results? Or was this eastern-biased model adopted precisely *because* it would give the desired result – namely, that an airport was needed east of Toronto?

Wherever the truth lies, the fact remains that biased data lead to biased results, which in turn lead to the sort of biased conclusions this study reached.

5. An Unhelpful Comparison of Multiple-Airport Systems

Eight North American multiple-airport systems were discussed in the Final Report. It isn’t made clear as to why these eight were chosen. Perhaps the choice allowed findings that best suited the unstated objective. We are told only that the chosen eight (of some eighteen multi-airport systems in North American) offer “significant levels of commercial air carrier service” (ch. 7, p. 1).

We are treated to a full-page comparison summary of the eight systems, plus Toronto’s (ch. 7, p. 3). But the table omits highly pertinent information:

- number and length of runways;
- land area covered by each airport;
- distance of each airport from the city centre;
- distance between airports in each system;
- each airport’s physical restrictions and other limitations.

Instead, a full third of the table is taken up with the names of the airports’ owners and operators, thereby allowing the Report’s authors to point out, as they coyly do in this chapter and elsewhere, that effective systems “are generally overseen by a single Board or Commission.” In Toronto’s case, that would, of course, be the GTAA.

Of the new airports discussed in this chapter, three – in Chicago, Dallas, and Houston – were developed intentionally to be primary airports, larger than the airports they were replacing. In both New York and Washington, a new airport was built to complement two existing airports in each city, and restrictions were placed on one of the original two in each case to ensure the new airport’s viability. In San Francisco a third airport was added but traffic remained concentrated at one of the original two. And in Los Angeles, although a new remote airport was built in phases, traffic stayed with the original airport. The eighth airport was Montreal’s Mirabel. In the examples most pertinent to this study, all show that restrictions had to be placed on the primary airport so as to force traffic to the new airport. But even imposing restrictions was no guarantee of success, as was discovered in Los Angeles and Montreal.

Mirabel was the only new airport to be deemed a failure. Various reasons are given for this: fewer passengers than forecast, too far from the city, problems caused by split operations, airline preference for Dorval. All could have been predicted, had wiser minds prevailed at the time. But the Final Report’s authors conclude that the real cause was the failure to close Dorval. Maybe so, but we think the truth lies elsewhere. Mirabel wasn’t needed. Forty years later, after a major expansion, Dorval (now Pierre Elliot Trudeau International) continues to successfully serve Montreal’s air passenger traffic without the help of a secondary major airport; Mirabel, never completed, is all but moribund now, handling cargo only.

In 2001, the original grandiose plans for an international airport at Pickering were dropped by Transport Canada in favour of a regional/reliever airport. The Chicago, Dallas, Houston, and Montreal examples (all new airports destined to replace a primary airport) are therefore not particularly relevant to the Pearson-Pickering discussion. Washington’s Dulles *was* designed to take a primary airport’s overflow but experienced slow growth, even though restrictions were placed on Reagan, the primary airport.

What does this tell us about Pickering? If the study’s arguments are taken to their logical conclusions, Pickering would have a chance of being successful *only* if it were jump-started by placing restrictions on Pearson or by temporarily closing Pearson. Yet the Final Report makes clear that closure is not an option; Pearson will remain Toronto’s primary airport (ch. 7, p. 15). And there is no suggestion of restricting Pearson. The Report merely opines that

restrictions have sometimes been placed on the original airport to promote the successful launch of a new airport. While often challenged by the airlines as unfair, this approach has often been successful at forcing traffic to other airports. However, if they are to succeed, these restrictions need to be firm enough to force carriers to shift traffic to the new site. (ch. 7, p. 14)

The main inference one can draw from this is that any airport at Pickering risks failure.

We are also told (ch. 7, p. 5) that, in order for secondary airports to successfully serve as reliever airports (likely for “low-cost” carriers), “they need to be able to operate without oppressive noise or traffic restrictions.” This implies, among other things, that the airports must be allowed to operate during the night without worrying about disturbing residential areas. But the City of Pickering is planning – and is starting to build – the town of Seaton, a new live/work community of 60,000 people, just across the fence from the airport site, in the corner nearest the proposed runways. And the approach of the proposed cross-wind runway would lie directly over the Town of Ajax, which has a population of over 98,000. So how could a Pickering airport operate without noise or traffic restrictions?

While the Final Report seems to assume that Pickering would handle mainly low-cost carriers, it acknowledges that both Hamilton and City Centre, which serve low-cost carriers, have experienced “significant passenger volume volatility over the years.” Indeed, Hamilton has been particularly severely hit by loss of business in the recent past – a development the Report does not mention. The authors do admit that

many more domestic airlines exist in the U.S. [...] than in Canada. Thus, in the American market, the risks associated with commencing a new service at a secondary airport are spread between many different airlines across many different markets. With fewer air carriers in Canada, the establishment of a secondary airport in the GGH is more challenging from that perspective. (ch. 7, p. 15)

These facts are self-evident. So shouldn't every possible effort be made to avoid building an airport that stands a good chance of failing?

While there are plusses connected with Pickering (proximity to a significant catchment population, good ground access), there are also serious minuses (the difficulty of enticing carriers to a secondary airport; the cost of moving or splitting operations (something airlines *hate* to do and avoid when they can); the difficulty of attracting and maintaining significant traffic). It's clear that the success of any new secondary airport serving low-cost carriers cannot be assured. Yet this is precisely the type of airport the Report is recommending – albeit, in a noticeably hesitant way.

6. Passenger Allocations and High-Speed Rail

The chapter on passenger allocations (ch. 8) contains a series of scenarios. All are based on Transport Canada's passenger volume forecasts. We already know that Transport Canada's forecasts in this Report are overstated – just as, with respect to Pickering, they have been overstated without exception since 1970, when planners and consultants were predicting laughably high numbers – so there is no point in wasting time on an analysis of the scenarios.

The effects of high-speed rail are dealt with by the study in a few paragraphs. The arguments are based on the observations of a study more than fifteen years old. High-speed rail as a travel option is viewed from a single perspective – that of the amount of traffic that rail would divert from Pearson – and the option is then dismissed, as follows: “the impact on overall air traffic demand would be fairly modest.” Environmental and other aspects/concerns are not addressed.

7. Corporate Jet / General Aviation Needs: A Study in Half-Truths

The Final Report, in ch. 9, looks at possible ways of handling future corporate jet / general aviation (CJ/GA) traffic. The discussion is particularly deserving of censure for its disingenuous “what-if?” scenarios, especially those dealing with the airports the Report calls “at risk” – namely, Buttonville, City Centre, and Oshawa.

Let's look first at the GTAA's “what if?” scenario for Buttonville – “assumed to close in 2032”:

As it happens, only a month after submitting the Final Report to Transport Canada, the GTAA served Buttonville with its death notice. When the closure (to be completed in 2015) was made public, on October 27, 2010, the *National Post* reported that Buttonville had been left with “no choice but to [close] after the Greater Toronto Airport [*sic*] Authority abruptly cut off a decade-old funding arrangement last April.” *Last April!* In short, while one arm of the GTAA was planning the imminent axing of Buttonville, another had recently been crafting little “what if?” scenarios for 2032, amid suggestions that any closure of Buttonville would be brought about by its owners' inability to resist the siren calls of developers.

Why did the GTAA suddenly pull the plug on an airport the Final Report describes as “the busiest general aviation/corporate airport in the GGH” and a “corporate aviation reliever and weather alternate for Pearson” (ch. 5, p. 25), and “the closest airport to downtown Toronto, other than Pearson, where corporate jets can operate, [and an airport that] fulfilled an important role by attracting activity that might otherwise choose Pearson” (ch. 2, p. 14)? This is the same Pearson whose capacity limits are apparently causing such concern. In fact, we have been told that Pearson will have to offload CJ/GA traffic to other airports in order to gain time. Yet in the same *National Post* article, a GTAA spokeswoman is quoted as saying that the GTAA pulled its funding for Buttonville due to “declining traffic at Pearson,” and that Pearson had to look after its own interests first.

Pardon?

Is traffic volume an issue at Pearson or is it not? Was Buttonville useful to Pearson or was it not? Was there a disagreement between the GTAA and the government over who should be responsible for

subsidizing Buttonville, and did the GTAA lose, so Buttonville lost? Or was the cancelled subsidy just another way of manufacturing need for a Pickering airport? Who knows? What we do know is that the GTAA, in its Final Report, was less than honest on the matter of Buttonville, an airport it *caused* to close shortly after the Report was completed.

Next, let's look at the GTAA's "what if?" scenario for City Centre Airport, also "assumed to close in 2032":

The airport (now called Billy Bishop) is operated by the Toronto Port Authority under a 50-year Tripartite Agreement that expires in 2033. The Agreement is between the Port Authority, the City of Toronto, and Transport Canada. The Final Report states that "no airport in the system is nearly as well positioned geographically as City Centre to efficiently serve medevac flights associated with the downtown Toronto hospitals" (ch. 9, p. 10). In fact, the airport is hugely popular,¹⁰ not least for its easy access, and shows no sign of wanting or needing to close, either now or in the future. Quite the opposite. Air Canada recently fought to get back into Billy Bishop and today shares the facility with busy Porter Airlines. Although some airport opponents, citing noise and air pollution issues, would like to see the airport replaced by parkland, any closure would likely be forced upon the airport by non-renewal of the Tripartite Agreement. It's hard to imagine the Port Authority or the City not wanting to renew the Agreement, given the overall benefits to Torontonians. So that leaves Transport Canada, which of course could refuse to sign a renewal as a way of manufacturing need for an airport in Pickering. Once again, the question is not, as the Final Report puts it: What if City Centre closes? The question is: What if City Centre *were made to close*?

Finally, let's look at the GTAA's "what if?" scenario for Oshawa Airport. This airport, too, is "assumed to close in 2032":

Again, the scenario deals in half-truths. Oshawa airport is represented as having an uncertain future. But as the Report admits elsewhere (ch. 5, pp. 29-30) it is "the possibility of the development of an airport in close proximity at Pickering" – together, we must add, with the fact that Transport Canada has kept up the threat for four decades and has even escalated it of late – that is the cause of the uncertainty.

The uncertainty no doubt became greater in 2004 with the release of the GTAA's *Pickering Airport Draft Plan*, which stated (ch. 2, p. 11) that "traffic now flying in and out of Oshawa will likely move to a new Pickering Airport [because it will] overwhelmingly find Pickering an ideal replacement." The current Region of Durham Official Plan tightens the screws: "The Oshawa Airport shall be developed to its fullest potential until such time as a new airport is established in the City of Pickering." How could any airport be expected to thrive and work towards a long-term future under such threats? The study Report acknowledges that "this threat has created a significant deterrent to private sector investment at the airport" (ch. 5, p. 30). No surprise there. The City was forced to make a public commitment to operate the Oshawa Airport for at least 25 years "in order to provide surety to airport investors."

The point is that Oshawa Airport's situation and outlook would be entirely different if the perennial threat of a Pickering airport were removed. Oshawa would no longer figure among the "at risk" airports in scenarios such as those in the GTAA's Final Report.

The Final Report observes that itinerant general aviation movements in the system under study rose by about 4 per cent between 2001 and 2006, and that the current regional level of about 160,000 annual general aviation itinerant movements "is expected to rise to over 240,000 by 2032, reflecting an average annual growth rate of about 1.6 per cent" (ch. 3, p. 14). Conversely, local movements within the airport system declined by 33 per cent over the same period. To explain this drop, the authors suggest that recreational flying is disappearing because of the high cost of fuel and aircraft rentals and the lure of other interests. Basing their reasoning on a number of assumptions, the Report's authors predict (ch. 3, p. 16)

¹⁰ See <http://www.newswire.ca/en/story/900629/billy-bishop-soars-in-2011>

that local aircraft movements will remain relatively flat over the forecast period, within a range of roughly 200,000 to 230,000 movements.

It should be noted that an independent review of the needs assessment study's conclusions, commissioned by COPA, the Canadian Owners and Pilots Association, found much to disagree with in the Final Report. It was noted that the complexity of general aviation hadn't been properly dealt with; the three airports said to be "at risk" were not; owners and managers could show that general aviation was not in decline; that conclusions in the Final Report had been reached by ignoring the broader context; and that the statistics used by the study were out of date while more up-to-date statistics pointed to quite different conclusions. We will not comment further on this matter, other than to say that COPA's review appears to have been professional and objective, and it further highlights the weaknesses in the GTAA's needs assessment study.

And what of the key conclusions "related to the need for a CJ/GA airport on the Pickering lands?"

One of these, the provision of a 4,000-ft. CJ/GA runway at Pickering, comes as a bolt from the blue. The authors even acknowledge that it is "somewhat anecdotal in nature" and admit that potential demand for such a runway "is not possible to estimate" because they are "without detailed information" (ch. 9, p. 17) – none of which kept the authors from turning an unsupported idea into a "key conclusion." Was the runway conclusion deemed necessary as a way of offsetting so many other key conclusions that found *no need* for an airport in Pickering? Because that is indeed what they found:

Purely from a CJ/GA demand and capacity perspective, the GGH airport system, as defined in this study, can accommodate the CJ/GA demand forecast for 2032 under all airport closure scenarios considered, under the assumption that the remaining airports are willing to accept displaced traffic up to their capacity limits. (ch. 9, p. 16)

If just one at-risk airport were to close (and we already know that Buttonville will be closed), then "although the need to relocate operations would obviously be significant to the CJ/GA users at that one specific airport, the overall airport system would appear to be capable of absorbing the displaced activity fairly readily."

And if two or three of the so-called at-risk airports were to close, then "the potential impact of traffic relocation is much higher [...] Nevertheless, the system could still accommodate the displaced traffic [...] strictly from a demand/capacity perspective."

In other words, although there might be financial impacts and user frustration, as far as corporate-jet and general-aviation traffic is concerned, the study concluded that there was *no need* for a new airport before 2032, the study's horizon date. Please note that the horizon date *is not the need date*. That date remains an unknown and might never materialize.

8. Cargo Capacity at Pearson

In ch. 10 we are told: "Since the freight forwarding community is typically concentrated near large passenger airports to take advantage of belly capacity, all-cargo airlines generally operate at large passenger airports." The Final Report explains that

the freight forwarding community relies on the wide range of destinations and the lower cost capacity available on passenger aircraft as well as the main deck capacity of freighter aircraft to accommodate larger consolidations and outsized shipments. (ch. 10, p. 3)

In short, cargo airlines will want to stay where the large commercial passenger planes and freighters are and will be. That means Pearson. And Hamilton.

We are also told that Pearson's "overall facility utilization is well below the industry average," and the same is true of Hamilton, where, in addition, the UPS facility is capable of a utilization factor in excess of the industry. Translation: there is no foreseeable shortage of cargo capacity at existing facilities.

Now let's look at some predictions in this chapter. On p. 4, we are told that "growth in the overall air cargo industry has tended to be stronger than growth in the air passenger market, a trend that is expected to continue in the future." The chart accompanying this statement shows a steady upward climb in cargo growth to 2013 but ends there (it's an old chart). Then we are told that

an air cargo forecast was developed for this study, based on the 'medium' cargo forecasts that were provided by Transport Canada for Pearson and Hamilton in June 2007. An extension of the Transport Canada forecasts out to the year 2032 was required, and assumed a continuing decline in the industry growth rates over the planning period. (ch. 10, p. 14)

We can't check the basis for the latter assertion because the government has seen fit to censor the accompanying diagram.

If cargo growth is expected to stay stronger than passenger growth, but cargo growth is simultaneously expected to decline, doesn't this mean that passenger growth will, *ipso facto*, also decline, and at a faster rate than cargo? Yet all of Transport Canada's forecasts show strong passenger growth at a constant, *rising* rate. Where lies the truth?

The same blacked-out diagram on p. 14 is used as the basis for arguing (on p. 15) that the only alternative to the status quo in the cargo area is the addition of an airport at Pickering. Ah. The status-quo scenario that follows confirms that Pearson and Hamilton "can effectively respond" to projected cargo needs, but we are treated to a Pearson/Hamilton/Pickering scenario nonetheless. When this produces the predictable result, the authors finally concede that an airport in Pickering "would be unlikely to capture a significant share of the GGH cargo market."

The conclusions (ch. 10, p. 19) are these:

- that the "anticipated use of smaller aircraft to serve [Pickering's] passenger market" means that the aircraft at Pickering would have "negligible cargo carrying capacity";
- that freighter operators need to be near the concentration of freight forwarders around Pearson;
- that no all-cargo carrier is likely to relocate to Pickering; and
- that, "given the significant investments made by the integrated carriers at Pearson and Hamilton, it is unlikely that they would split their GGH operations by starting a sizable operation in Pickering."

The only possible option for a Pickering airport seems to be that it "could potentially serve the north-eastern portion of the GGH market through a modest integrated carrier operation." This kind of talk is worthless – pure hypothesis – and fails to show need. In fact, it shows *no* need.

After much hedging, the Final Report finally states that

from an air cargo demand-capacity perspective, a new airport is not required within the planning horizon. Furthermore, if a new commercial airport were to be constructed at Pickering for reasons unrelated to air cargo, it is projected that the vast majority of participants in the air cargo industry would prefer to stay at Pearson and Hamilton given the investment in infrastructure at those airports, and the concentration of freight forwarders around Pearson. (ch. 10, p. 19)

The Report is uncharacteristically explicit on this point. An airport at Pickering cannot be justified for cargo needs before 2032, the horizon date of the study. Please note again that the horizon date *is not the need date*. A need date might never arise.

Analysis of Chapter 12: Overall Needs Case for Pickering Airport

Re: "Site Attributes"

The Report's authors claim (ch. 12, p. 8) that, "despite the consideration of environmental factors," the GTAA's *Pickering Airport Draft Plan Report* "reconfirmed the site's suitability for an airport." This is a distortion of the facts. The Plan "reconfirmed" (translation: chose to pursue the airport idea) *despite strong evidence that an airport would be environmentally detrimental to the area*. The Draft Plan's third chapter, "Environment," makes such a powerful and convincing case *against* an airport that it is a shock to turn the page and be confronted with "4. Runway and Airside Development Plan" – as if chapter 3 had been referring to some other site entirely.

The Environment chapter points out that "Duffins and Carruthers are the healthiest watersheds in the GTA" (ch. 3, p. 18) and that any change in the upper aquifer recharge rate or any pollution of the recharge waters "will have an immediate impact on down gradient fisheries and farm and domestic water supplies." In the next chapter (ch. 4, p. 47) we learn that if an airport is built, all we can expect is a "minimizing" of impacts on Michell Creek and on West Duffins Creek and its tributaries. Minimizing isn't preventing. It simply means contamination on a lesser scale than might have been.

Given the many significant environmental issues raised in chapter 3, how could the Pickering site ever be deemed suitable for an airport?

The study's authors claim that "a relatively low population exists in the immediate vicinity of the lands" (ch. 12, p. 8). This is true today, but it won't be true five years from now. An airport built on the site and the big new community of Seaton will be sitting cheek by jowl.

Re: Costs (or, as the Final Report puts it, "Pricing")

Tellingly, with the exception of some oil price assumptions (ch. 3, p. 9), specific costs are not discussed in the Report. We are simply told that

neither the Needs Assessment Study nor any of the studies referenced in Chapter 2 examined the issue of potential pricing in Pickering relative to other airports in the system. The only very general observation that can be made is that SOAAS [the Southern Ontario Area Airports Study] concluded that developing a major reliever airport in Hamilton would be approximately ten to 15 per cent less expensive than an airport of the same size in Pickering, which could give Hamilton a slight pricing advantage. (ch. 12, p.10)

The SOAAS study was fifteen years old when the needs assessment study's Final Report was submitted, and the reference to it in the Final Report implies that no cost estimate has been undertaken since. We can safely assume, however, that the "ten to 15 per cent less" is a gross understatement. Would expanding an existing airport, with all its infrastructure already in place, really cost so very little less than building an airport from scratch, with all that such a massive undertaking entails? Not to mention the additional effort involved in trying to make that new airport viable. Where are the calculations? Show us the evidence. The Report contains none.

We are also told (ch. 12, p. 8) that the "costs have already been paid in assembling the Pickering lands." The statement is true – as far as it goes. But the cost of assembling the land was just a part of what Canadians have paid for this "airport site." The authors briskly side-step the amount allocated over a period of forty years to Public Works Canada and Transport Canada, and to those under contract to them, to *administer* (however poorly) these 29 square miles of hamlets, farmland, and natural areas, which none of Transport Canada's considerable and persistent efforts have so far been able to convert into an airport. "Pickering airport" has possibly cost Canadians billions by now – we may never know how much. But having paid the money is no reason to build an unnecessary and unwanted airport, or to keep prime farmland in perpetual limbo.

Re: Airline Cooperation

The Final Report states: “While it is not possible to predict the degree to which airline cooperation would or would not occur in Pickering or at any other reliever airport, the strong local demand in Pickering increases the likelihood of airline interest in serving the market” (ch. 12, p. 10). No source is cited for this claim. *Is there strong local demand? It so, it’s news to us. And even if there were strong demand in Pickering, it would hardly constitute a powerful lure to airlines. The City has a population of about 100,000. Even if we add in the populations of Ajax and Whitby, 300,000 people couldn’t justify the building of a regional/reliever airport. Besides, the “strong local demand” assertion, put another way in an earlier chapter, does not assure an airport’s success: “Strong market potential and airline cooperation are closely linked. The first is a precedent for the second, but having strong market potential does not guarantee airline cooperation” (ch. 7, p. 19).*

Re: Opportunity

The Final Report’s authors write, as an argument for retaining the site for a possible airport: “It is inconceivable that a large parcel of land comparable in size to the Pickering lands could be amassed again in the future” (ch. 12, p. 8). This is simply untrue. The government can use its powerful Expropriation Act at any time to take over any land it wants or needs. And while the Report is right in saying, further on, that there would be financial and social costs associated with finding another site, the main – and unmentioned – cost would undoubtedly be political, especially when a convincing case has yet to be made for another big new airport for Toronto. It should be added that not all costs are in the past, with respect to Pickering. The opposition to an airport has never died here, and shows no sign of doing so.

Re: CJ/GA Traffic and a Need for Pickering

The Final Report states that, ignoring relocation impacts, “an airport in Pickering is not required to serve CJ/GA traffic within the planning horizon, even with the closure of at-risk airports (Buttonville, City Centre and Oshawa)” (ch. 12, p. 4). Yet the authors still feel obliged to push for Pickering (ch. 12, p. 8): “The Needs Assessment Study shares the SOAAS view that the provision of a runway in excess of the 1,219 m (4,000 ft.) currently available on the eastern side of the GTA would potentially be of benefit to the corporate aviation community.” *Shares the view. Would potentially be of benefit.* This is about as strong as things get in the Report. The authors are referring here to the same 4,000-ft. runway that became a surprise key conclusion in chapter 9 (p. 17). Yet in chapter 12 they finally acknowledge that

an extension of the primary runway in Oshawa may be possible, perhaps to a length of approximately 1,524 m (5,000 ft.), an opportunity that the Oshawa Airport Business Plan indicates should be explored in the short term. This possibility, in conjunction with [...] the City of Oshawa’s commitment to keep the airport operational for a period of at least 25 years, potentially provides an interim solution to this concern without building a new airport in Pickering. (ch. 12, p. 5)

The Final Report is full of such waffling. But there is never an acknowledgement that, if Oshawa weren’t under the perpetual threat of a Pickering airport, it would be able to offer far more to the CJ/GA community. There *are* options, other than Pickering, to be explored.

The vagueness, the omissions, and the contradictions of the Final Report are matched only by the disingenuousness:

Since the potential value of a CJ/GA airport on the Pickering lands is closely tied to the possibility of future airport closures, and since it is not possible to predict at this time if or when those closures may occur, a time estimate of when a CJ/GA facility could be considered in Pickering cannot be given. (ch. 12, p. 7)

There is little doubt that, at the time that sentence was written, the GTAA already knew (or suspected) that it would soon be killing Buttonville. And Buttonville was axed long before Transport Canada released the Final Report – without alterations to, or comment on, the statements concerning Buttonville. Did they think no one would notice?!

Still, the bottom line here, according to the Report, is that *no* Pickering airport is needed for CJ/GA traffic, just as *no* Pickering airport is needed for cargo traffic.

Re: Commercial Passenger Traffic and a Need for Pickering

The Final Report states that if Hamilton and Waterloo are not developed as commercial reliever airports, the need for Pickering “could theoretically materialize as early as 2023. However, this is considered to be an unlikely scenario, since there is every indication that Hamilton Airport can and would be developed to fulfil [that] role” (ch. 12, p. 6). The Report goes on to say that, in such a case, Pickering would be required “in the 2027–2029 time period, depending on the degree to which Waterloo Airport is also developed.” (All of these dates are still based on Transport Canada’s inflated baseline traffic forecasts, don’t forget.)

Then we are told that, if Hamilton and Waterloo achieve higher passenger capacities than the GTAA has assigned to them, or if CJ/GA traffic leaves Pearson, then need for Pickering “would be delayed until the 2032–2033 time period, again based on the baseline traffic forecasts.” Or, if one uses Transport Canada’s “pessimistic” (i.e., more realistic but still inflated) traffic forecasts, there would be “a seven to eight year slippage [and] the timelines for requiring a commercial airport at Pickering would be delayed to 2034–2037 [...] or to 2039–2041.” The authors (using gut feel? a flipped coin?) finally settle on 2027–2037 as the most likely time frame.

But they themselves remain palpably unconvinced. They now abandon dates and state that “a commercial airport in Pickering will be required in the future, although not necessarily within this study’s planning horizon” (ch. 12, p. 8). Is it necessary to point out that “the future” is an unknown and unknowable time?

Next, the Final Report recommends “that the Pickering lands be retained and protected for future aviation needs,” again, with no indication of when those needs might arise. Finally, we are told that “the site is the envy of many other metropolitan areas [and so] it is prudent planning to retain and protect the site, thereby preserving the option of building an airport, if and when required” (ch. 12, p. 9).

There are two critical points to be made here:

- The envy of others is no argument for hanging onto the vast Pickering site on the off-chance that it might someday be needed.
- Even after forty years, the need for this airport is still so nebulous that the GTAA, a body that *wants* the airport, is unable to fix a date of need. We are now told that it’s a matter of “if and when required.” **“If” can mean never.**

The Final Report’s bottom line is that there is *no need* for an airport before 2023, and that 2023 is deemed unlikely; instead, we are told that the need could show itself some four to fourteen years later, or maybe another four years after that, or even later, if ever.

Such blue-sky forecasting is of little or no value, and the dates are too far into the uncertain future to have any credibility. It is impossible to predict where air traffic will be in 30 years’ time. But we are already seeing signs that a future of unfettered or steady growth is far less likely than one of limitations and restrictions on growth. Environmental issues are multiplying and worsening, communications developments (video conferencing, Skype, etc.) are making air travel less necessary or desirable in many instances. The old models and the old ways of thinking about air travel will lose their validity as we face new challenges on our planet in the twenty-first century.

Conclusions

The GTAA's *Needs Assessment Study: Pickering Lands* fails to make a case for a Pickering airport. Furthermore, the study and its Final Report are fatally flawed.

The passenger forecasts were exaggerated, the catchment area model gave biased results, Pearson's efficiency and capacity limits are open to question. The Report is a compilation of sly "what-if?" scenarios and of estimates that the authors themselves frequently characterize as "high level" and "very high level" (which sounds impressive but means "rough" and "very rough"; in other words, worthless). The content is fuzzy, vague, often contradictory. It ignores the broader travel picture and looks at air travel in isolation – an unrealistic perspective. And last – but by no means least – the GTAA has a flagrant conflict of interest and should never have been asked to conduct the study in the first place.

It is intriguing to note that, in another GTAA document, entitled "Management's Discussion and Analysis and Financial Statements" (2011),¹¹ there is a prominent section called "Caution Regarding Forward-looking Information." Such information is described as being

based on a variety of assumptions and is subject to risks and uncertainties. There is significant risk that predictions, forecasts, conclusions and projections [...] will not prove to be accurate, that the assumptions may not be correct and that actual results may vary from the forward-looking information.

The document's readers are cautioned not to overly rely on such information. They are told that, "words such as 'believe,' 'expect,' 'plan,' 'intend,' 'estimate,' 'anticipate,' and similar expressions, as well as future or conditional verbs such as 'will,' 'should,' 'would,' and 'could' often identify such information." A most interesting example of unreliable forward-looking information is given: "statements regarding demand for air travel in the GTA."

We have quoted at length from this passage because it is highly relevant to the discussion at hand. We need hardly point out that no such caution appears in the *Needs Assessment Study: Pickering Lands*. Yet the Final Report is riddled with the type of words the other document warns of: *would* (used 371 times), *could* (134), *likely* (79), *estimate* and its variations (72), *expect* and *expected* (42), *potentially* (34), *may* (33), *should* (24), *anticipate* (22), *somewhat* (18), *may be* (12), *most likely* (11)... We also find *possibly*, *might*, *perhaps*, *high level*, *would appear to*, *at some point in the future*, *not possible to predict/assess/estimate*, *if and when*. Forward-looking information abounds in the study's Final Report. Let the reader beware!

For more than a year, Transport Canada told the public that the Report could not be released because it was undergoing a "comprehensive due diligence review," during which the department was "checking and verifying [the Study's] assumptions, methodology and findings to ensure completeness and adequacy." It beggars the imagination that the person or persons undertaking the review could have found no grounds for grave concern in this Final Report.

After wasting billions of dollars on Mirabel, does Transport Canada truly believe that it's in the public interest *not* to have an independent study, by third-party experts, on the most cost-effective and publicly acceptable way to meet central Canada's future travel needs? Does Transport Canada truly believe that it's in the public interest to justify spending billions more dollars on an airport recommended on the basis of bad data and unsupported claims? The Canadian public expects and deserves better.

It would be a travesty if the federal government decided to build an airport in Pickering on the basis of such a report. The arguments for a Pickering airport are even weaker than those put forward in the 1960s for Mirabel. Do we want to go that route again? Have we learned nothing in forty years? Can we not *move on* at last?

Land Over Landings, April 2012

¹¹ To locate the pdf, do a Google search on: Management Discussion Toronto Pearson 2011.